

TASHA PARIS CHALFANT (SBN 207055)
THE LAW OFFICE OF TASHA PARIS CHALFANT
5701 Lonetree Blvd., Suite 312
Rocklin, California 95765
Phone: (916) 444-6100
Fax: (916) 930-6093
E-mail: tashachalfant@gmail.com

KRESTA NORA DALY (SBN 199689)
BARTH DALY LLP
P.O. Box F
Winters, California 95694
Phone: (916) 440-8600
Fax: (916) 440-9610
E-mail: kdaly@barth-daly.com

Attorneys for Defendant
BRADLEY EARL REGER

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	No. 2:23-cr-0177 TLN
)	
Plaintiff,)	STIPULATION REGARDING
)	EXCLUDABLE TIME PERIODS UNDER
v.)	SPEEDY TRIAL ACT; FINDINGS AND
)	ORDER
BRADLEY EARL REGER,)	
)	
Defendant.)	

STIPULATION

Plaintiff United States of America, by and through its counsel of record Assistant United States Attorneys CHRISTINA McCALL and ROGER YANG, and the Defendant, BRADLEY EARL REGER, by and through his counsel of record TASHA PARIS CHALFANT and KRESTA NORA DALY, hereby stipulate and request that the Court make the following findings and Order as follows:

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE
AND FOR EXCLUSION OF TIME

1 1. By previous order, this matter was set for a status conference before Judge Troy L.
2 Nunley on September 19, 2024, with time excluded to that date.

3 2. By this stipulation, the defendant now moves to continue the status conference until
4 October 3, 2024, and to exclude time between September 19, 2024, and October 3, 2024, under
5 Local Code T4. Plaintiff does not oppose this request.

6 3. The parties agree and stipulate, and request that the Court find the following:

7 a. The government has represented that the discovery associated with this case will
8 be voluminous and provided over periodic productions. To date, we have received approximately
9 370,000 pages which includes both protected and unprotected discovery such investigative reports
10 in electronic form, as well as a voluminous amount of audio/video and native files.
11

12 b. Counsel for the defendant desires additional time to review the voluminous
13 discovery, develop the case, conduct investigation, consult with their client, discuss potential
14 resolution, and to explain the consequences and guidelines. Both defense counsel are now
15 unavailable on September 19, 2024 and discussed this issue with the government.
16

17 c. Counsel for the defendant believes that failure to grant the above-requested
18 continuance would deny them the reasonable time necessary for effective preparation, taking into
19 account the exercise of due diligence.
20

21 d. The government does not object to the continuance.

22 e. Based on the above-stated findings, the ends of justice served by continuing the
23 case as requested outweigh the interest of the public and the defendant in a trial within the original
24 date prescribed by the Speedy Trial Act.
25

26 f. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
27

28 STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE
 AND FOR EXCLUSION OF TIME

et seq., within which trial must commence, the time period of September 19, 2024, to October 3, 2024, inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it results from a continuance granted by the Court at defendant's request on the basis of the Court's finding that the ends of justice served by taking such action outweigh the best interest of the public and the defendant in a speedy trial.

4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial must commence.

All counsel has reviewed this proposed order and authorized Tasha Chalfant to sign it on their behalf.

IT IS SO STIPULATED.

Dated: September 4, 2024

by: /s/Tasha Chalfant for
CHRISTINA McCALL
Assistant U.S. Attorney
Attorney for Plaintiff

Dated: September 4, 2024

by: /s/Tasha Chalfant for
ROGER YANG
Assistant U.S. Attorney
Attorney for Plaintiff

Dated: September 4, 2024

by: /s/Tasha Chalfant
TASHA CHALFANT
Attorney for Defendant
BRADLEY EARL REGER

Dated: September 4, 2024

by: /s/Tasha Chalfant for
KRESTA NORA DALY
Attorney for Defendant
BRADLEY EARL REGER

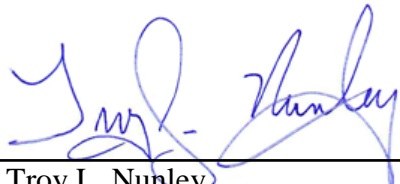
STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE
AND FOR EXCLUSION OF TIME

ORDER

The Court, having received, read, and considered the stipulation of the parties, and good cause appearing therefrom, adopts the stipulation of the parties in its entirety as its order. Based on the stipulation of the parties and the recitation of facts contained therein, the Court finds that the failure to grant a continuance in this case would deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The Court finds that the ends of justice to be served by granting the requested continuance outweigh the best interests of the public and the defendant in a speedy trial.

The Court orders that the time from the date of the parties' stipulation, September 19, 2024, to and including October 3, 2024, status conference hearing date shall be excluded from computation of time within which the trial of this case must be commenced under the Speedy Trial Act, pursuant to 18 U.S.C §3161(h)(7)(A) and (B) (iv), and Local Code T4 (reasonable time for defense counsel to prepare). It is further ordered that the presently set September 19, 2024, status conference shall be continued to October 3, 2024, at 9:30 a.m.

IT IS SO FOUND AND ORDERED this 5th day of September, 2024.



Troy L. Nunley
United States District Judge

STIPULATION AND ORDER FOR CONTINUANCE OF STATUS CONFERENCE
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